

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FOSSA LTD., ICELANDICPLUS LLC and  
STEVEN BARLOW,  
Plaintiffs,

v.

I JIAN LIN and  
ENCOMPASS COMMUNICATIONS, INC.,  
Defendants,

Case No. **1:16-cv-11914**

**ASSENTED-TO MOTION FOR LEAVE TO  
FILE SINGLE OR COMBINED  
MEMORANDA IN OPPOSITION TO  
COUNTERCLAIM-DEFENDANTS'  
MOTIONS TO DISMISS, NOT TO EXCEED  
49 PAGES**

I JIAN LIN and  
ENCOMPASS COMMUNICATIONS, INC.  
Counterclaim-Plaintiffs,

v.

FOSSA LTD., ICELANDICPLUS LLC, STEVEN  
BARLOW,

Counterclaim-Defendants,  
and

VALENTIN DAVID GURVITZ, ESQ.,  
BOSTON LAW GROUP, P.C., and SONYA  
LIVSHITS

Additional Counterclaim-Defendants.

Defendants/Counterclaim-Plaintiffs I Jian Lin and Encompass Communications, Inc. (“Lin and Encompass”) respectively request leave to file briefs with a combined total of 49 pages in opposition to Counterclaim-Defendants’ two separate Motions to Dismiss.

The Counterclaim-Defendants have filed two separate but overlapping Motions to Dismiss, one for Fossa, Ltd., IcelandicPLUS LLC, Steven Barlow, and Sonya Livshits (the “Barlow Defendants”), and the other for Valentin Gurvits and Boston Law Group, P.C (the “BLG Defendants”). The Court has already granted the BLG Defendants’ motion to exceed the 20-page limit, allowing up to 29 pages. (Dkt. No. 27.) Thus, the Counterclaim-Defendants were granted a total of 49 pages to make their arguments (not including that the Barlow Defendants saved space by incorporating arguments made by the BLG Defendants).

Lin and Encompass's briefs in opposition to the two Motions to Dismiss are currently due on March 9, 2017. Lin and Encompass are evaluating whether to file two separate briefs in opposition or instead to submit a combined opposition brief. In the interim, they ask that they be granted leave to file either separate briefs or a single combined brief with a total page limit not to exceed 49 pages.

Counterclaim-Defendants assent to this motion.

### **CONCLUSION**

For the foregoing reasons, Lin and Encompass respectfully request that the Court grant them leave to file one or two briefs in opposition to the Motions to Dismiss, not to exceed 49 pages combined.

Dated: March 7, 2017

Respectfully submitted,

/s/ Mitchell J. Matorin  
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**Certificate of Service**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 7, 2017.

/s/ Mitchell J. Matorin